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Attorneys for Defendant
FIRST HERITAGE CREDIT, LLC

UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

ROLANDA BROWN,

Plaintiff,

v.

EQUIFAX INFORMATION SERVICES, LLC,
a Georgia limited liability company, WEB
BANK, a foreign corporation, 1ST HERITAGE
CREDIT, a foreign company, and CONN
CREDIT CORPORATION, INC., a foreign
corporation,

Defendants.

Case No. 2:19-cv-01455-GMN-BNW

**STIPULATION AND ORDER FOR
EXTENSION OF TIME FOR
DEFENDANT FIRST HERITAGE
CREDIT, LLC TO RESPOND TO
PLAINTIFF'S COMPLAINT**

(SECOND REQUEST)

IT IS HEREBY STIPULATED AND AGREED between Defendant, FIRST HERITAGE CREDIT, LLC (hereinafter, "FHC") and Plaintiff, ROLANDA BROWN, by and through their undersigned counsel, that FHC shall have up to and including January 10, 2020 to file a Response to Plaintiff's Complaint.

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1 This is FHC's second request for an extension, and is not intended to cause any delay or
2 prejudice to any party. This extension is necessary in order to allow counsel to continue to negotiate
3 possible settlement of the case through the holiday season.

4 Trial has not been set in this case yet. By way of this stipulation, FHC does not waive any
5 defenses, affirmative or otherwise, which it could properly assert in any subsequent pre-Answer
6 response to Plaintiff Rolanda Brown's Complaint, including but not limited to: defective service of
7 process, FRCP 12(b)(6), or improper venue.

8 DATED: December 18, 2019

DATED: December 18, 2019

9 WOLFE & WYMAN LLP

10
11 By: /s/ Racheal A. Ross, Esq.

12 RACHEAL A. ROSS, ESQ.
13 Nevada State Bar No. 14943
14 6757 Spencer Street
15 Las Vegas, NV 89119
16 Attorneys for Defendant
17 FIRST HERITAGE CREDIT, LLC

By: /s/ Francis Arenas, Esq.

FRANCIS ARENAS, ESQ.
7500 W. Lake Mead Blvd., Suite 286
Las Vegas, NV 89128
Attorney for Plaintiff

ORDER

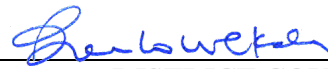
Based on the Stipulation of the parties, and good cause appearing therefore,

IT IS HEREBY ORDERED, ADJUDGED AND DECREED that FIRST HERITAGE CREDIT, LLC shall have up to and including January 10, 2020 to file a Response to Plaintiff's Complaint.

IT IS SO ORDERED.

DATED: 12/19/2019

By: _____



**Brenda Weksler
United States Magistrate Judge**

Respectfully submit by:

DATED: December 18, 2019

WOLFE & WYMAN LLP

By: /s/ Racheal A. Ross, Esq.

RACHEAL A. ROSS, ESQ.

Nevada Bar No.: 14943

6757 Spencer Street

Las Vegas, NV 89119

Attorneys for Defendant

FIRST HERITAGE CREDIT, LLC

1 **CERTIFICATE OF MAILING**

2 On December 18, 2019, I served the foregoing **STIPULATION AND ORDER FOR**
3 **EXTENSION OF TIME FOR DEFENDANT FIRST HERITAGE CREDIT, LLC TO**
4 **RESPOND TO PLAINTIFFS' COMPLAINT (SECOND REQUEST)**, by the following means
5 to the persons as listed below:

6 ☒ a. EFC System (you must attach the "Notice of Electronic Filing," or list all
7 persons and addresses and attach additional paper if necessary):

8 ☐ b. United States Mail, postage fully pre-paid (List persons and addresses.
9 Attach additional paper if necessary):

10 FRANCIS ARENAS, ESQ. faarenas@aol.com
11 7500 W. Lake Mead Blvd., Suite 286
12 Las Vegas, NV 89128
Attorney for Plaintiff

13 /s/ Evelyn Pastor
14 Evelyn Pastor
An employee of Wolfe & Wyman LLP